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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN CIVIL LIBERTIES UNION

Plaintiffs,

v.

UNITED STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT; UNITED
STATES DEPARTMENT OF
HOMELAND SECURITY,

Defendants.

Case No. 4:23-cv-3450

**JOINT MOTION FOR A HYBRID
SETTLEMENT CONFERENCE**

Parties hereby jointly move the Court to permit counsel and government representatives not residing in California to attend the settlement conference scheduled for March 27, 2024 at 11:30 a.m. via videoconference, in order to reduce the burden and costs for all parties involved. Parties have thus far attended all other proceedings in this case via videoconference without incident.

Plaintiff in this case seeks the release of records from Defendants Immigration and Customs Enforcement (“ICE”) and Department of Homeland Security (“DHS”) under the Freedom of Information Act (“FOIA”).

Parties seek to allow counsel and government representatives who do not reside in the San Francisco Bay Area to participate in the settlement conference via videoconference or telephone. These individuals include:

- Eunice Cho, Sr. Staff Attorney at the ACLU National Prison Project, Plaintiff’s counsel. Ms. Cho is based in the ACLU’s Washington, D.C. office, and resides in the Washington, D.C. metro area.
- Azadeh Rezvani, Associate Legal Advisor, U.S. Immigration and Customs Enforcement, agency counsel on behalf of Defendants. Ms. Rezvani works for ICE in Washington, D.C. and resides in the Washington D.C. metro area.

Individuals who will be able to attend the settlement conference in person include:

- Kyle Virgien, Sr. Staff Attorney, ACLU National Prison Project, for Plaintiff.
- Marisol Dominguez-Ruiz, Justice Catalyst Fellow, ACLU National Prison Project, for Plaintiff.
- David DeVito, Assistant United States Attorney, Northern District of California, for Defendants.

For the foregoing reasons, the Parties respectfully jointly request that the Court permit the aforementioned counsel and client representatives to attend the settlement

1 conference via video conference.

2
3 DATED: February 20, 2024

Respectfully submitted,

4 ACLU NATIONAL PRISON PROJECT

5
6 By: /s/ Marisol Dominguez-Ruiz

7 Marisol Dominguez-Ruiz

8 Attorney for Plaintiffs

9
10 DATED: February 20, 2024

ISMAIL J. RAMSEY

United States Attorney

11
12 By: s/David M. DeVito

DAVID M. DEVITO

13 Assistant United States Attorney

14 Attorney for Defendants

ATTESTATION OF SIGNATURES

I, Marisol Dominguez-Ruiz, hereby attest, pursuant to Local Civil Rule 5-1(i)(3) of the Northern District of California, that I have obtained the concurrence of each signatory hereto in the filing of this document.

Dated: February 20, 2024

s/Marisol Dominguez-Ruiz
Marisol Dominguez-Ruiz
mdominguez-ruiz@aclu.org

Attorney for Plaintiff
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION